

TIMOTHY P. NEUMANN, ESQ.
BROEGE, NEUMANN, FISCHER & SHAVER, LLC
25 ABE VOORHEES DRIVE
MANASQUAN, NEW JERSEY 08736
TNEUMANN@BNFSBANKRUPTCY.COM
PHONE 732 223 8484
FAX 732 223 2416
ATTORNEY FOR DEFENDANTS
TN6429

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

In the Matter of:	:	CHAPTER 7
MICHAEL J. QUIGLEY, III	:	
	:	CASE NO. 08-24297/KCF
<u>Debtor</u>	:	
PEGGY E. STALFORD, CHAPTER 7	:	ADV. PRO. NO. 09-1723
TRUSTEE FOR THE DEBTOR ESTATE	:	
OF MICHAEL J. QUIGLEY, III	:	
	:	
Plaintiff	:	
v.	:	
	:	
MICHAEL J. QUIGLEY, III and	:	
MARIANNE G. QUIGLEY	:	
	:	
<u>Defendants</u>	:	

ANSWER TO COMPLAINT TO (i) BAR DISCHARGE OF
DEBT PURSUANT TO 11 U.S.C. §727, (ii) TO AVOID
FRAUDULENT TRANSFERS AND OTHER RELATED RELIEF

STATEMENT OF JURISDICTION

1-3. Admitted.

PARTIES

4-6. Admitted.

COUNT ONE

7-10. Admitted.

- 11. Denied.
- 12. Admitted.
- 13. Denied.
- 14. Denied that there are any documents that have not been turned over. The remainder of the allegations contained in paragraph 14 are admitted.
- 15-20. Denied.

COUNT TWO

- 21. Defendants repeat their answers to the allegations contained in each and every allegation contained in paragraphs 1-20 of the complaint as though the same were more fully and at length set forth herein.
- 22. Admitted except that there cannot be two majority members.
- 23. Denied that policy number 40061050 and policy number 40067925 were to fund the Buy/Sell Agreement. The remainder of the allegations contained in paragraph 23 of the complaint are admitted.
- 24. Denied.
- 25. Admitted.
- 26-43. Denied.

COUNT THREE

- 44. Defendants repeat their answers to the allegations contained in each and every allegation contained in paragraphs 1-43 of the complaint as though the same were more fully and at length set forth herein.
- 45-46. Admitted.
- 47-54. Denied.

55. Admitted.

56. Denied.

COUNT FOUR

57. Defendants repeat their answers to the allegations contained in each and every allegation contained in paragraphs 1-56 of the complaint as though the same were more fully and at length set forth herein.

58-67. Denied.

FIRST SEPARATE DEFENSE

The Complaint fails to state a claim upon which relief can be granted.

BROEGE, NEUMANN, FISCHER & SHAVER, LLC
Attorneys for Defendants

By /s/ Timothy P. Neumann

Dated: May 29, 2009